



Attorney Docket No.: L0562.70049US00

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s): Jeffrey S. Poulin
Serial No.: 10/803,856
Filed: March 18, 2004
For: METHODS AND APPARATUS FOR PROCESSING BUSINESS REPLY
MAIL
Examiner: Jon M. Bass
Art Unit: 3639

CERTIFICATE OF MAILING UNDER 37 C.F.R. §1.8(a)

The undersigned hereby certifies that this document is being placed in the United States mail with first-class postage attached, addressed to Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on December 18, 2006.

Eileen MacKenzie
Signature

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

DECLARATION OF ALFRED T. RUNDLE UNDER 37 C.F.R. §1.132

I, Alfred T. Rundle, attest that:

1. I am currently employed as a Principal Software Engineer at Lockheed Martin Corporation, the assignee of the above-identified application, but I am not one of the named inventors on the application. I hold a Bachelor of Science degree in Electrical Engineering from The Pennsylvania State University and I have completed graduate coursework in circuit analysis and digital computing at Syracuse University. I have twenty-eight years of industry experience in the optical character recognition (OCR) field and I am an inventor on multiple OCR-related patents. I have served as the technical lead and architecture focal point for Lockheed Martin's optical character recognition (OCR) postal programs and provided technical leadership for the engineering team that developed the U.S. Postal Service RCR letter mail address recognition system, which reads recipient addresses on thirty billion mail pieces annually. Prior to working at Lockheed Martin, I was employed at International Business Machines (IBM) Corporation, where I served as technical lead and manager of a department that designed OCR equipment for

check-reading. I led the effort to redesign personal checks to standards, still in use today, that provide high-accuracy OCR of courtesy amount fields on checks. I have received multiple formal awards from IBM and Lockheed Martin for accomplishments in the OCR field.

2. I have reviewed the specification and claims of the above-identified application. I have also reviewed the Office Action mailed September 8, 2006 and the Connelly reference (U.S. Patent No. 6,459,953) discussed therein.

3. I disagree with the assertions in paragraphs 3, 4, and 5 of the Office Action that Connelly discloses a system that processes both business reply mail pieces and non-business reply mail pieces. Rather, it is my opinion that the system disclosed in Connelly processes only business reply mail pieces. The system of Connelly extracts customer response data from a business reply mail piece. The processing of a mail piece by the system of Connelly depends on the identification of a Job ID Code that is printed on each business reply mail piece. The Job ID Code for a business reply mail piece allows the system to determine the format and layout of the business reply mail piece to facilitate recognition processing of the business reply mail piece. Mail pieces in a general mail stream that are not business reply mail pieces will not have a Job ID code printed on them. Because the system of Connelly relies on a Job ID Code to process a mail piece, it is my opinion that the system of Connelly would be unable to process non-business reply mail pieces. Moreover, there is no disclosure in Connelly of how business reply mail pieces could be distinguished from non-business reply mail pieces or how non-business reply mail pieces could be handled or processed. Thus, it is my opinion that Connelly does not disclose a system capable of processing a mail stream that includes both business reply mail pieces and non-business reply mail pieces.

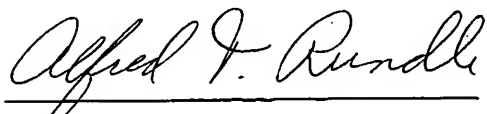
4. At column 3, lines 21-24, Connelly states that "[b]undles of mail pieces (not shown), such as: business reply cards, post cards, and the like, are loaded by an operator into the processing system 100 at the input feeder module 102." I disagree with the assertion in the Office Action that the above-quoted passage indicates that the system of Connelly is capable of handling both business reply mail pieces and non-business reply mail pieces. My understanding of the above-quoted language is that the business reply mail pieces handled by the system of

Connelly may be any type of business reply mail piece, such as a business reply card, a post card, or some other type of business reply mail, such as a business reply envelope. That is, at column 3, lines 6-9, Connelly states that "[a]lthough FIGS. 2A, 2B, 2C, and 2D all show post card type business reply mail pieces, those skilled in the art will recognize that the business reply mail piece may also be an envelope along with its contents." This sentence indicates that the business reply mail pieces may be post cards or other types of business reply mail pieces, such as envelopes. In view of this statement, it is my opinion that the reference to "business reply cards, post cards, and the like" at column 3, lines 21-24 indicates that input feeder module 102 may receive types of business reply mail pieces other than business reply cards, such as, for example, business reply envelopes.

4. At column 3, lines 27-38, Connelly states, "[p]referably, the input feeder module 102 and the singulator module 104 are of a type that can handle mail pieces of mixed size, thickness and weight... This capability is important because it is largely anticipated that the mail pieces received at a central location are part of different mail campaigns." I disagree with the assertion on page 3 of the Office Action that the reference to "different mail campaigns" indicates that the mail pieces received at the input feeder module may be business reply mail and non-business reply mail. Rather, it is my understanding that the term "different mail campaigns" refers to different business reply campaigns, each of which may involve a business reply mail piece of a particular size and format, and each of which may have a Job ID code that allows the system of to determine its format and perform character recognition. Specifically, the Abstract of Connelly states that, "[t]he control module includes a mail campaign job database. The control module uses the job ID code to access processing data from the mail campaign job database corresponding to the job ID code and controls the scanner module using the processing data to read the field data from the business reply mail piece." Further, at column 5, lines 8-10, Connelly states, "[r]eferring to FIG. 4 in view of FIGS. 1 and 3, a mail campaign job database, including a job data set 160, located within the control module 112 is shown," and at column 10, lines 14-16, Connelly discloses a method of operating a business reply mail system comprising a step of "using the job ID code to access processing data from a mail campaign job database corresponding to the job ID code..." It is my opinion that the above-quoted passages indicate that a mail campaign is a set of business reply mail pieces that each have the same job ID code

(i.e., because each have the same format, layout, and size) and that a mail campaign job database stores information that enables the system to process business reply mail pieces from each campaign.

7. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued therefrom. Executed on this 13TH day of December, 2006.



Alfred T. Rundle